



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/FTB
F. #2018R02344

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 17, 2021

By E-mail and ECF

The Honorable Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Bryan Cho
Criminal Docket No. 21-040 (AMD)

Dear Judge Donnelly:

The government writes respectfully to request that the Court enter the enclosed proposed Protective Order to facilitate the production of discovery in the above-referenced case. The government intends to produce (and has already produced) to the defendant in discovery a number of records, communications, and documents that contain personal identifying information, including, among other things, bank records, financial information, and travel and other identification documents. The proposed Protective Order will safeguard the privacy interests implicated by the production of such materials.

The government has consulted with counsel for the defendant who has indicated that they have no objection to the entry of the proposed Protective Order at this time, subject to their ability to raise any specific issues that may arise as the case progresses

and additional discovery is provided. Accordingly, the government respectfully requests that the Court enter the proposed Order. Thank you for the Court's attention to this matter.

Respectfully submitted,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
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Enclosure: Proposed Order

cc: Counsel of Record (by Email and ECF)